

December 14, 2016

Mary D. Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2030 Target Scoping Plan Discussion Draft

Chair Nichols:

On behalf of the California Transit Association, I would like to thank you for the opportunity to comment on the California Air Resources Board's (ARB) 2030 Target Scoping Plan Discussion Draft. The Association represents more than 200 transit-affiliated entities in California, including transit agencies, original equipment manufacturers, and part suppliers. Taken together, our members provide the vast majority of the 1.44 billion unlinked transit trips taken in California annually, and drive innovation in the heavy-duty vehicle sector that reduces greenhouse gas (GHG) emissions and improves air quality. I write to you today, as ARB staff continues its work on the 2030 Target Scoping Plan, to underscore the importance of expanding the state's investment in public transit capital and operations as a means of increasing access to safe and reliable transportation options to all Californians and achieving our GHG emissions targets for 2030.

Throughout the development of the Discussion Draft, ARB staff has recommended that the state support transit as an alternative to single-occupant vehicle travel by investing in transit projects that expand capacity, increase service levels, and improve accessibility and reliability for the traveling public. We are pleased that the Discussion Draft continues these recommendations by highlighting the importance of existing measures that strengthen transit, while alluding to potential new measures that the ARB may pursue to accelerate affordable transit-oriented and infill development, expand access to transit, reduce commute trips and maximize the use of alternatives to the automobile. We believe that should these potential new measures be implemented, with input from the Association, they will build on the successes of existing transit-supporting programs like the Transit and Intercity Rail Capital and Low Carbon Transit Operations programs, which together have reduced GHG emissions by 4.2 million metric tons and driven more than \$650 million of investment in disadvantaged communities. Moving forward, the Association will continue to advocate for additional investment in the TIRCP, LCTOP and various transit-related Low Carbon Transportation programs, and we welcome the opportunity to work with the ARB and the Legislature to further develop new measures that will incite the transformational changes in travel behavior and GHG emissions reductions envisioned by this document.

Additionally, we are pleased that the Discussion Draft supports potential new measures to "stabilize transportation funding so investments are available to develop sustainable and well-maintained transportation networks in California." We recognize that such efforts generally fall outside of the range of

this scoping process and the ARB, but we continue to believe that declining state support from the State Transit Assistance program undermines our ability to maintain reliable and efficient transit service, and diminishes the benefits of investments of GGRF dollars in transit capital and operations. Again, the Association will continue to advocate for increased funding for the STA program; we encourage ARB to join our efforts to emphasize to state policymakers the criticality of this funding to maximizing the benefits of the state's limited GGRF dollars, and to achieving the state's ambitious GHG emission reduction targets.

Finally, the Discussion Document makes broad allusions to vehicle electrification as a component of the state's GHG reduction strategy. The Association supports efforts to increase the deployment of near-zero and zero-emission transit vehicles in California, but we will continue to emphasize that such efforts, whether through purchase mandate or overly stringent performance requirements, must not jeopardize the fiscal solvency of California's transit agencies or diminish their ability to maintain and/or expand transit service-levels. Ultimately, the Association believes that any action to implement cleaner transit fleet technologies must be cost-effective and supported with new funding.

We look forward to further engaging with you in the development of the 2030 Target Scoping Plan. If you have any questions, please do not hesitate to reach out to me directly at josh@caltransit.org or at 916-446-4656.

Sincerely,

A handwritten signature in black ink that reads "Joshua W. Shaw". The signature is fluid and cursive, with a large initial 'J' and 'S'.

Joshua W. Shaw
Executive Director

cc: Members and Staff, California Air Resources Board